

Dear Colleague:

As managers, you are aware of our current guidelines for hiring casual wage (CW) employees and know that CW employees cannot exceed 910 hours in any rolling 12-month period. I am writing to update you on a component of the federal Affordable Care Act (“ACA”) that further impacts how we use and manage our CW employees. The ACA requires employers who offer health coverage to their full-time employees to also allow employees who are not otherwise benefit-eligible (e.g., CW employees) to elect health coverage if they reach a certain “hours threshold”. To comply with these new regulations, we must:

- Track hours for all ongoing employees, part-time employees, seasonal employees and variable hour employees and
- Offer health coverage to casual wage and intermittent workers if they work sufficient hours to be considered full-time\* and
- Provide a report to the IRS in early 2016 with information about our full-time\* employees and the coverage we offer them.

**\*The IRS defines a full-time employee as one who works, on average, at least 30 hours per week.**

Due to these new regulations, we must alter the way we hire casual wage employees. Beginning in 2015, casual wage employees can be hired if:

- The CW employee works less than 28 hours per week and the position is scheduled to end within three months. If the manager would like to extend the employment of a CW employee working less than 28 hours per week beyond three months, an analysis of previously worked hours must take place within Human Resources before the extension could be approved.
- The CW employee works 28 hours or more per week for less than three months. (In this case, a start and end date will be entered into Banner by Human Resources and an extension will not be permitted.)

These rules do not apply to independent contractors or to temporary workers hired through an agency.

If you have any questions regarding these changes, please don't hesitate to contact me at [cslaboden@wellesley.edu](mailto:cslaboden@wellesley.edu) (x2216) or other members of the Human Resources team, including: Marymichele Delaney [mdelaney@wellesley.edu](mailto:mdelaney@wellesley.edu) (x2215)

Sincerely,

Carolyn Slaboden  
Assistant Vice President for Human Resources

*Human Resources Values and Respects Confidentiality*

---